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June 10, 2015

VIA ECF

Hon. Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Room 2260
New York, NY 10007-1312

Re: Carl Davis v. Joseph McCready, Losif Shpits, Frentz Medard, Bianca Morisset, Jacob Mathew, Vaise Jonson, Sabina Gritta, Warren Bush, Emmanuel Charles, Scott Parks, Girty Asiedu, Olga Segal, Guy Kelly, Rommel Montilus, Marshall Tse, Corizon Health, The City of New York
Docket No.: 14-CV-6405
Our File No.: 611-3233

Dear Judge Woods:

This office has been retained by the Law Department of the City of New York to represent The City of New York and Corizon Health, Inc., as well as individual defendants Joseph McCready, RPA, Iosif Shpits, MD, Bianca Morisset, Jacob Mathew, Valsa Johnson, Sabina Gritta, Emmanuel Charles, Scott Parks, RPA-C, Gifty Asiedu, Guy Kelly, PA, Rommel Montilus, MD, and Marshal Tse, MD, in the above referenced matter. Additionally, we anticipate representing defendants Frantz Medard, MD and Warren Bush.

As a preliminary matter, we hereby waive service of summons on behalf of the City of New York pursuant to the Court's request in the April 1, 2015 Order of Service.

We write to respectfully request an extension of time to answer or otherwise respond to plaintiff's Amended Complaint on behalf of the defendants listed above. Based on the Marshal's Process Receipts filed with the Court on June 2, 2015, the current deadline to answer or otherwise respond to the plaintiff's Amended Complaint is June 12, 2015.¹ There have been no prior requests for an extension of time. This office was only recently retained by the Law Department and this extension is necessary to communicate with our sixteen anticipated clients

¹ This deadline is applicable to all defendants except the City of New York, who has not been served but is waiving service of summons.

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regarding the allegations in the Amended Complaint and properly evaluate plaintiff's claims. Since plaintiff is *pro se* and incarcerated, we are unable to ascertain whether he consents to our request. We respectfully propose that the defendants deadline to respond to the Amended Complaint be extended to July 13, 2015.

Thank you for your consideration of this request.

Respectfully submitted,



J.C. O'Brien (JO 1397)

JCOB:vm

To: CARL DAVIS
Plaintiff *Pro Se*
361-15-00015
Rikers Island - GRVC
09-09 Hazen Street
East Elmhurst, NY 11370

CARL DAVIS
Plaintiff Pro Se
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Rikers Island - OBCC
15-15 Hazen Street
East Elmhurst, NY 11370

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2015, the foregoing document was delivered to plaintiff by overnight mail.

/s/ J.C. O'Brien (JC1397)